

1 Howard E. Cole, Bar No. 4950
2 HCole@lewisroca.com
3 Jennifer K. Hostetler, Bar No. 11994
4 JHostetler@lewisroca.com
5 LEWIS ROCA ROTHGERBER CHRISTIE LLP
6 3993 Howard Hughes Parkway, Suite 600
7 Las Vegas, NV 89169
8 Tel: 702.949.8200
9 Fax: 702.949.8398

10 Robert G. Riegel, Jr.*
11 Florida Bar No. 0352759
12 rriegel@rtlaw.com
13 Michael J. Lufkin*
14 Florida Bar No. 0030492
15 mlufkin@rtlaw.com
16 ROGERS TOWERS, P.A.
17 1301 Riverplace Boulevard, Suite 1500
18 Jacksonville, FL 32207
19 Tel: 904.398-3911
20 Fax: 904.348-5894
21 *Admitted Pro Hac Vice

22 Attorneys for Defendant Chromalloy Nevada

23
24 UNITED STATES DISTRICT COURT
25 DISTRICT OF NEVADA

26 MARCI WELCH, an individual,

27 Plaintiff,

28 v.

29 CHROMALLOY NEVADA, business entity
30 unknown; RAMON PERROT, an individual,
31 an individual, and DOES I-20, inclusive;
32 ROE CORPORATIONS 1-20, inclusive,

33 Defendants.

34 Case No. 3:21-cv-00135-HDM-WGC

35
36 **JOINT MOTION FOR EXTENSION
37 OF TIME TO FILE STIPULATION
38 OF DISMISSAL**

39 Pursuant to Fed. R. Civ. P. 6(b) and LR 7-2, Plaintiff Marci Welch and Defendant
40 Chromalloy Nevada (collectively, the “Parties”) jointly move for entry of an Order briefly
41 extending the Parties’ deadline to file a stipulation of dismissal in the above-styled action. As
42 grounds, the Parties state:

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1. On June 8, 2021, the Parties filed a Joint Notice of Settlement (ECF No. 21) concerning the above matter.

2. On June 9, 2021, this Court entered an Order (ECF No. 22) directing the Parties to file a stipulation dismissing this case by June 30, 2021.

3. The Parties have worked toward having all necessary documents completed by the current June 30 deadline; however, because of the undersigned counsel's litigation schedules, additional time is needed for the Parties to complete that process.

4. Accordingly, the Parties request a brief extension of time, up to and including July 14, 2021, to file the requisite stipulation of dismissal.

5. This Joint Motion is being brought in good faith and not for purposes of delay, and neither of the Parties will be prejudiced by the requested extension of time.

WHEREFORE, the Parties respectfully request an extension, up to and including July 14, 2021, to finalize the Parties' settlement and file their stipulation of dismissal of this action in its entirety.

MEMORANDUM OF LAW

Pursuant to LR 7-2(a), the Parties submit this Memorandum of Law in support of the foregoing Joint Motion. Under Fed. R. Civ. P. Rule 6(b)(1), a court may extend the time to perform an act if a request is made before the original time expires, provided, however, that good cause is shown. The instance circumstances constitute good cause. The Parties have been working diligently preparing and finalizing the necessary settlement papers and file the requisite stipulation of dismissal, but additional time is needed because of the undersigned's respective litigation

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1 schedules. Accordingly, the Parties respectfully request up to and including July 14, 2021 to file
2 a stipulation of dismissal concerning this action.

3 DATED this 30th day of June 2021.

4 RICHARD A. HARRIS LAW FIRM

5 By: /s/ Burke Huber

6 Burke Huber, Bar No. 10902
7 burke@richardharrislaw.com
8 801 South Fourth Street
9 Las Vegas, NV 89101
Tel.: 714.392.9555
Fax: 702.444.4455

10 Attorney for Plaintiff

DATED this 30th day of June 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Howard E. Cole

Howard E. Cole, Bar No. 4950
HCole@lewisroca.com
Jennifer K. Hostetler, Bar No. 11994
JHostetler@lewisroca.com
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel.: 702.949.8200
Fax: 702.949.8398

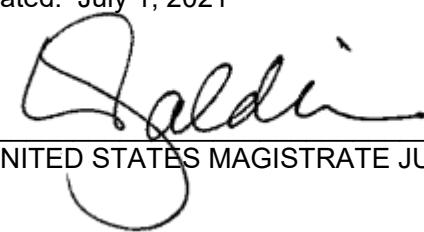
11 and

12 Robert G. Riegel, Jr.*
13 Florida Bar No. 0352759
14 rriegel@rtlaw.com
15 Michael J. Lufkin*
16 Florida Bar No. 0030492
17 mlufkin@rtlaw.com
18 ROGERS TOWERS, P.A.
19 1301 Riverplace Boulevard, Suite 1500
Jacksonville, FL 32207
Tel.: 904.398.3911
Fax: 904.348.5894
*Admitted Pro Hac Vice

20 Attorneys for Defendant Chromalloy Nevada

21 IT IS SO ORDERED.

22 Dated: July 1, 2021

23 
24 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2021, I caused a true and accurate copy of the foregoing document entitled **JOINT MOTION FOR EXTENSION OF TIME TO FILE STIPULATION OF DISMISSAL** to be filed via the Court's CM/ECF system, which will accomplish service on all parties of record through their counsel, including:

Burke Huber, Esq.
Richard Harris Law Firm
801 South Fourth Street
Las Vegas, NV 89101
burke@richardharrislaw.com

Attorney for Plaintiff

By: /s / Dana K. Provost
An Employee of Lewis Roca
Rothgerber Christie LLP